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Attorney for Defendant
JOSE LUIS RAMOS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:21-cr-00225-WBS
)	
Plaintiff,)	STIPULATION AND ORDER TO
)	CONTINUE STATUS CONFERENCE AND
v.)	EXCLUDE TIME
)	
JESUS CELAYA, ET AL)	
)	Date: August 28, 2023
Defendants.)	Time: 9:00 a.m.
)	
)	

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel, Assistant United States Attorney Alstyn Bennett, counsel for plaintiff, Assistant Federal Defender Megan T. Hopkins, counsel for defendant Jose Luis Ramos, and Mario Rodriguez, counsel for defendant Jesus Celaya, that the status conference scheduled for July 10, 2023, be continued **August 28, 2023, at 9:00 a.m.**

The defense is conducting ongoing investigation, engaging in pre plea negotiations, and reciprocal exchange of discovery. An additional six (6) weeks will allow for the time necessary for the defense to conduct its investigation and for the defendants to determine how best to proceed in this case. Accordingly, the parties request that the status conference in this matter be reset for August 28, 2023. The parties agree that the ends of justice served by resetting the status

1 conference date outweigh the best interest of the public and the defendant in a speedy trial.
2 Therefore, the parties agree that time is excludable from July 10, 2023, through August 28, 2023,
3 pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4).

4
5 Dated: July 5, 2023

Respectfully submitted,

6 HEATHER E. WILLIAMS
Federal Public Defender

7 /s/ Megan T. Hopkins
8 MEGAN T. HOPKINS
Assistant Federal Defender
Attorney for Defendant
9 JOSE LUIS RAMOS

10
11 Dated: July 5, 2023

/s/ Mario Rodriguez
12 MARIO RODRIGUEZ
Attorney for Defendant
JESUS CELAYA

13 PHILLIP A. TALBERT
United States Attorney

14 Dated: July 5, 2023

/s/ Alstyn Bennett
15 ALSTYN BENNETT
CAMERON DESMOND
Assistant United States Attorneys
Attorneys for Plaintiff
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ORDER

IT IS HEREBY ORDERED that the status conference scheduled for July 10, 2023, at 9:00 a.m. is continued to **August 28, 2023, at 9:00 a.m.** The time period between July 10, 2023 and August 28, 2023, is excluded under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv), as the ends of justice served by granting the continuance outweigh the best interest of the public and the defendant in a speedy trial.

Dated: July 5, 2023



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE